

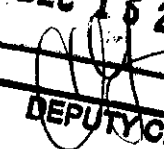
UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : Criminal No. 3-CR-15- 299
:
-vs- : 18 USC § 1343 (wire fraud)
: 18 USC §1028A (aggravated identity theft)
:
KEVIN L. REESE, :
Defendant : (J.)

INDICTMENT

THE GRAND JURY CHARGES:

COUNTS 1 through 6
Title 18, United States Code, § 1343
(Wire Fraud)

FILED
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At all times material to this Indictment:

1. The defendant, Kevin L. REESE, was an employee of Sheehan Pipe Line and Construction Company (Sheehan). Sheehan is a pipeline construction company specializing in main line construction, integrity management, and hydrostatic testing programs of pipelines throughout the United States with a main office located in Tulsa, Oklahoma.

2. Pursuant to his employment, REESE operated from various field offices including the Sheehan field office located at 200 Keystone Industrial Park Drive, Dunmore, Pennsylvania.

3. REESE was hired by Sheehan in or about 2012 as an office manager. In that position, REESE was responsible for oversight of project specific field offices. REESE acted as the liaison between local employees and Sheehan's main office in

Tulsa. His duties also included management of vendors, accounts payable, time records, and payroll. REESE was responsible for ensuring that Sheehan employees were set up properly within the payroll system and that they were paid correctly according to union contracts and time records turned over to REESE by project foremen.

4. From on or about November 1, 2014 and continuing through on or about August 31, 2015, in the Middle District of Pennsylvania and elsewhere, the defendant,

KEVIN L. REESE,

devised and intended to devise a scheme to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

5. It was part of the scheme that on multiple occasions, REESE created and issued fraudulent payroll checks in various amounts of money in the names of various Sheehan employees for time periods the employees had not worked.

6. It was part of the scheme that once he created the payroll checks in the names of various employees, REESE then forged the signatures of the various employees on the fraudulent payroll checks issued in their names.

7. It was part of the scheme that REESE cashed the fraudulent payroll checks at various local financial institutions, as well as at the on-site check cashing service set up at Sheehan work sites to facilitate the cashing of payroll checks by Sheehan employees.

8. REESE received cash in exchange for each fraudulent check he negotiated and then converted the cash for the purpose of unlawfully enriching himself and for his personal benefit.

9. The fraudulent payroll checks created and cashed by REESE were drawn on a bank account owned by Sheehan at American Bank and Trust located in Tulsa, Oklahoma.

10. For the purpose of executing the scheme described above, and attempting to do so, REESE caused to be transmitted via wire communications in interstate commerce the payment of the following fraudulent checks, among others:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
1	May 7, 2015	Check # 997326 issued in the amount of \$3,231.83 payable to DB
2	May 7, 2015	Check # 997438 issued in the amount of \$2,919.46 payable to KC
3	May 28, 2015	Check # 998128 issued in the amount of \$1,252.86 payable to TG
4	July 23, 2015	Check # 1001752 issued in the amount of \$3,724.55 payable to DST
5	July 30, 2015	Check # 1002243 issued in the amount of \$3,165.16 payable to MJL
6	July 30, 2015	Check # 1002245 issued in the amount of \$1,753.68 payable to VA

All in violation of Title 18, United States Code, § 1343.

THE GRAND JURY FURTHER CHARGES:

COUNTS 7 through 12

**Title 18, United States Code, § 1028A
(Aggravated Identity Theft)**

11. The allegations contained in paragraphs 1 through 10 of this Indictment are fully incorporated herein.
12. Beginning in or about November 1, 2014 and continuing through August 31, 2015, in the Middle District of Pennsylvania and elsewhere, the defendant,

KEVIN L. REESE,

did knowingly use without lawful authority, the means of identification of another, during and in relation to the crime of wire fraud (Title 18, United States Code, §1343), knowing that the means of identifications belonged to other persons, affecting interstate commerce, to wit: the defendant issued fraudulent payroll checks in the names of the following persons and forged their signatures on the payroll checks in order to cash the checks:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION</u>
7	May 7, 2015	Check # 997326 issued in the amount of \$3,231.83 payable to DB
8	May 7, 2015	Check # 997438 issued in the amount of \$2,919.46 payable to KC
9	May 28, 2015	Check # 998128 issued in the amount of \$1,252.86 payable to TG

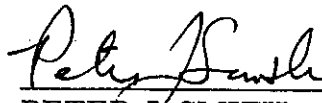
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| 10 | July 23, 2015 | Check # 1001752 issued in the amount of \$3,724.55 payable to DST |
| 11 | July 30, 2015 | Check # 1002243 issued in the amount of \$3,165.16 payable to MJL |
| 12 | July 30, 2015 | Check # 1002245 issued in the amount of \$1,753.68 payable to VA |

In violation of Title 18, United States Code, § 1028A.

A TRUE BILL

Date: 12/15/15




PETER J. SMITH *BY*
United States Attorney